

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

|                          |   |                         |
|--------------------------|---|-------------------------|
| UNITED STATES OF AMERICA | ) |                         |
|                          | ) | Case No. 1:20-CR-143    |
| v.                       | ) |                         |
|                          | ) | Trial: October 19, 2021 |
| ZACKARY ELLIS SANDERS,   | ) |                         |
|                          | ) |                         |
| <i>Defendant.</i>        | ) |                         |
| _____                    | ) |                         |

**UNITED STATES' MOTION TO SEAL MOTION TO EXCLUDE TESTIMONY**

The United States of America, by and through undersigned counsel, pursuant to Local Rule of Criminal Procedure 49, hereby files this motion to seal its motion to exclude proposed expert testimony.

The Court has supervisory power over its own records and may, in its discretion, seal documents if the public's right of access is outweighed by competing interests. In re Knight Pub. Co., 743 F.2d 231, 235 (4th Cir. 1984). Such sealing is within the discretion of this Court and may be granted for "any legitimate prosecutorial need." United States v. Ramey, 791 F.2d 317, 321 (4th Cir. 1986); see also Baltimore Sun Co. v. Goetz, 886 F.2d 60, 65 (4th Cir. 1989).

The government's motion includes references to personal medical information pertaining to the defendant, public disclosure of which would be inappropriate. Additionally, the government's motion references the Court's Order of October 12, 2021, which is currently under seal. Accordingly, the government requests that the Court order that the response be sealed, and

remain under seal until further order of the Court. A proposed order is attached.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

/s/

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## CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2021, I filed the foregoing document with the Clerk of Court, and caused a copy to be served upon all counsel of record, via CM/ECF.

By: /s/  
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